

PUBLIC DISCLOSURE

MAY 26, 2000

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

NORTH ABINGTON CO-OPERATIVE BANK

6 HARRISON AVENUE
NORTH ABINGTON, MASSACHUSETTS 02351

DIVISION OF BANKS
ONE SOUTH STATION
BOSTON, MA 02110

<p>NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this financial institution.</p>
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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires the Division of Banks (Division) to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the needs of its entire assessment area, including low and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the Division must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **NORTH ABINGTON CO-OPERATIVE BANK (NACB)** prepared by the Massachusetts Division of Banks, the institution's supervisory agency.

INSTITUTION'S CRA RATING: This institution is rated "Satisfactory"

Based on the five criteria specified for institutions with assets under \$250 million, North Abington Co-operative Bank's overall CRA performance is considered satisfactory. The bank's loan-to-deposit ratio currently stands at 79.1 percent as of March 31, 2000 with an average of 75.5 percent over the last 8 quarters. These figures demonstrate an acceptable performance level that meets the standards for satisfactory performance.

Residential loan data for calendar year 1999 and the first quarter of 2000 indicate that NACB originated less than the majority of its mortgage loans within the assessment area. The bank does not meet the standards for satisfactory performance under this category.

Low and moderate-income family households represent 34.9 percent of total family households within the bank's assessment area. However, escalating housing costs and the lack of affordable housing opportunities within the assessment area has limited loan activity among low and moderate-income individuals. Given these extenuating circumstances, the bank's efforts in lending to borrowers of different income levels is considered adequate and meets the standards for satisfactory performance.

The bank's assessment area consists only of middle-income census tracts. As such, a complete analysis of the geographic distribution of loans was not conducted, as such analysis would not be meaningful.

Finally, the bank has not received any complaints pertaining to its CRA performance and fair lending policies and practices are considered reasonable.

PERFORMANCE CONTEXT

Description of Institution

North Abington Co-operative Bank (NACB) is a state-chartered mutually held institution. The bank's headquarters and full-service office is located at 6 Harrison Avenue in Abington. Drive-up teller service and an automated teller machine are provided for customer convenience. Hours of operation are convenient and extended hours are provided on Friday evening and Saturday morning.

According to FFIEC Call Report data, the bank's total assets as of March 31, 2000, were \$65,592,000 with loans comprising 70.8 percent of NACB's total assets. Also according to the Call Report for the period March 31 1998 through March 31, 2000, total assets decreased approximately 6.3 percent. The bank is primarily a residential mortgage lender. Residential mortgage loans account for 91.8 percent of the total dollar volume of loans in the bank's portfolio. Each category of the remaining loan types accounts for less than 5.0 percent of the total loan portfolio. The remaining loan portfolio consists of consumer loans, home equity lines of credit, and loans on nonfarm nonresidential properties.

There appears to be no legal or financial impediments that would prevent the bank from helping to meet the credit needs within the assessment area. The Federal Deposit Insurance Corporation (FDIC) last examined the bank for compliance with the Community Reinvestment Act on April 20, 1999. That examination resulted in a CRA rating of "Satisfactory". The previous examination conducted by the Division of Banks on November 7, 1997 also resulted in a rating of "Satisfactory".

Description of Assessment Area

The Community Reinvestment Act (CRA) requires financial institutions to define an assessment area within which its lending efforts are focused. The Division of Banks (Division) evaluates the institution's CRA performance based upon the defined assessment area. North Abington Co-operative Bank has defined as its assessment area as the towns of Abington and Whitman, both located in the Brockton Metropolitan Statistical Area (MSA); and Rockland which is located in the Boston MSA. The median family income for the Brockton MSA was \$55,700 for 1999, and \$57,700 for 2000. The median family income for the Boston MSA was \$62,700 in 1999, \$65,500 in 2000.

The bank's assessment area is composed of 10 census tracts, all of which are middle-income. Table A below provides housing data for the census tracts that make up the assessment area.

ASSESSMENT AREA HOUSING DATA*							
CENSUS TRACTS	HOUSING UNITS	VACANT UNITS	% OWNER-OCCUPIED	%RENTAL	TOTAL FAMILIES	%	MEDIAN VALUE
MIDDLE INCOME	15,296	525	68.3	28.2	11,184	100.0	\$145,637

*Based on 1990 Census Data.

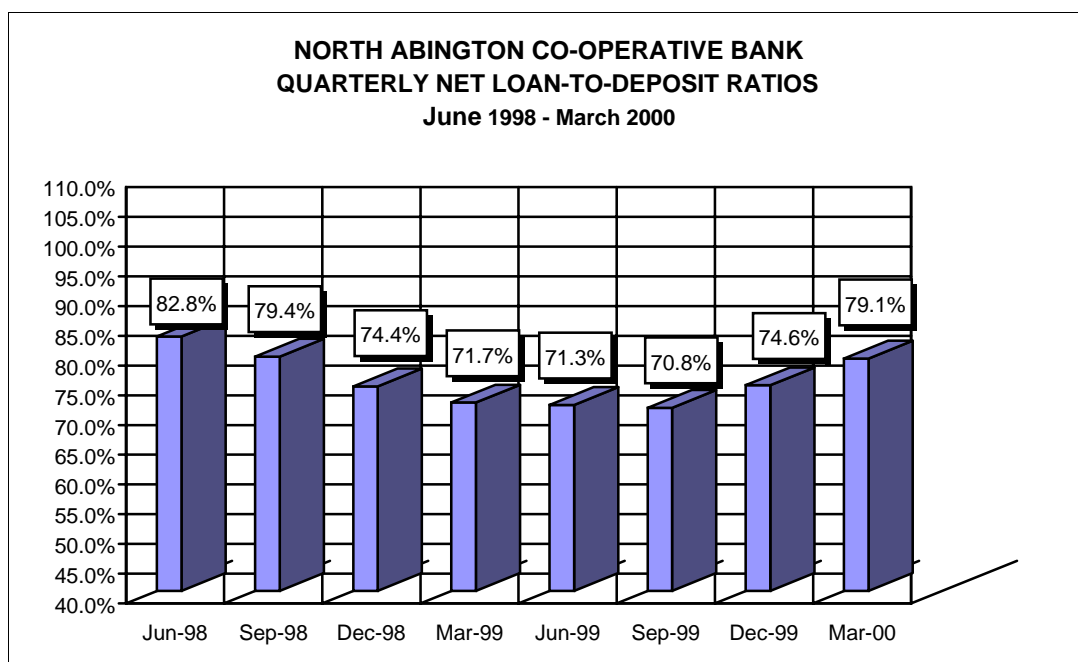
According to 1990 U.S. Census data, the assessment area has a total population of 43,180 individuals residing in 14,683 households. There are a total of 11,184 families residing in the assessment area. Of this total 16.5 percent are low-income, 18.4 percent are moderate-income, 29.3 percent are middle-income and 35.8 percent are upper-income.

PERFORMANCE CRITERIA

1. LOAN TO DEPOSIT ANALYSIS

Based upon NACB's asset size, its capacity to lend, and the credit needs of its customers, the institution's net loan-to-deposit ratio meets the standards for satisfactory performance.

An analysis of North Abington Co-operative Bank's net loan-to-deposit (LTD) ratio was performed during the examination. The analysis utilized the last eight quarters of the Federal Financial Institutions Examination Council (FFIEC) Call Report data for this institution. The bank's net loans to total deposits as reported to the FFIEC were reviewed for the quarters ending June 30, 1998 through March 31, 2000. The following chart indicates that for the period reviewed, the bank's net LTD ratios steadily decreased from a high of 82.8 percent as of June 30, 1998, to a low of 70.8 percent as of September 30, 1999. The chart further indicates that ratios rebounded in fourth quarter 1999 and currently stands at 79.1 percent. NACB's average net loan-to-deposit ratio for this period is 75.5 percent. Call report data for the period under review also indicates that total loans decreased by approximately 11.1 percent while total deposits decreased by 6.7 percent. Refer to the following table.



North Abington Co-operative Bank's average loan to deposit ratio as of March 31, 2000 of 79.1 percent compares reasonably to other institutions of similar size and type that operate within the bank's assessment area. Refer to the following table for further information.

LOAN-TO-DEPOSIT RATIOS AS OF MARCH 31, 2000		
Institution	Assets	LTD Ratios
South Shore Co-operative Bank	\$100,828	93.2%
Weymouth Co-operative Bank	\$101,748	88.1%
North Abington Co-operative Bank	\$65,592	79.1%
Rockland Savings	\$124,851	47.3%

The bank is a portfolio lender and neither purchases nor sells mortgages in the secondary market.

Based on the preceding information, the bank's performance in this area is considered adequate and meets the standards for satisfactory performance.

2. COMPARISON OF CREDIT EXTENDED INSIDE AND OUTSIDE OF THE ASSESSMENT AREA(S)

Based upon an analysis of residential loan data, the bank's level of lending within the assessment area does not meet the standards for satisfactory performance.

A review of NACB's Home Mortgage Disclosure Act (HMDA) data for calendar year 1998, and year-to-date May 26, 2000 and a review of a sample of consumer installment loan data for the same time period was conducted. This information was used to determine the institution's level of lending inside the assessment area in comparison to the level of lending outside the assessment area. Loan data consists of mortgage loans on residential 1-to-4 family and multi-family properties; and a sample of consumer installment loans composed of personal unsecured and vehicle loans. According to this information, the bank originated 69 residential mortgages in calendar year 1999 and 31 residential mortgages as of May 26, 2000. Loans originated inside the bank's assessment area represented 40.0 percent of the total number and 37.8 percent of the dollar volume. The Town of Abington exhibited the largest concentration of loans originated with 24.0 percent of the total number and 24.1 percent of the total dollar amount. Rockland was a distant second with 10 percent of the total number and 8.4 percent of the total dollar volume. Management stated that the lower number of residential loans originated from within the assessment area could be attributed to a number of factors. These factors include: the rising property costs in the assessment area; the lower housing costs in areas south of the assessment area and the subsequent move (of a significant segment) of the bank's customers seeking more available and affordable housing there.

Loans originated outside of the bank's delineated assessment area represented 60 percent of the total number and 62.2 percent of the total dollar volume for the period

reviewed. Although no areas of concentration were noted there appears to be a trend in loan originations south of the bank's assessment area. Refer to the following tables for additional information.

Table 2a

RESIDENTIAL LOANS ORIGINATED BY NUMBER						
LOCATION	1999		2000*		TOTALS	
	#	%	#	%	#	%
Abington	19	27.5	5	16.1	24	24.0
Rockland	6	8.7	4	13.0	10	10.0
Whitman	5	7.2	1	3.2	6	6.0
INSIDE ASSESSMENT AREA	30	43.5	10	32.3	40	40.0
OUTSIDE ASSESSMENT AREA	39	56.5	21	67.7	60	60.0
TOTALS	69	100	31	100	100	100

Source: HMDA/LAR Data

Table 2b

RESIDENTIAL LOANS ORIGINATED BY DOLLAR AMOUNT						
LOCATION	1999		2000*		TOTALS	
	\$000	%	\$000	%	\$000	%
Abington	2,250	28.3	655	15.8	2,905	24.1
Rockland	600	7.6	418	10.1	1,018	8.4
Whitman	543	6.8	95	2.3	638	5.3
INSIDE ASSESSMENT AREA	3,393	42.7	1,168	28.2	4,561	37.8
OUTSIDE ASSESSMENT AREA	4,551	57.3	2,969	71.8	7,520	62.2
TOTALS	7,944	100.	4,137	100.	12,081	100.

Source: HMDA/LAR Data *Year-to-Date May 26, 2000

Consumer Loans

Consumer Loans were also analyzed to determine their distribution inside and outside of the bank's assessment areas. The consumer loan analysis utilized a sample of loan data obtained from the bank. The period reviewed included calendar year 1999 and first quarter 2000 information. According to this analysis, NACB originated the majority of its consumer loans in the sample (76.6 percent of the total number and 71.8 percent of the total dollar volume) inside the assessment area. Please refer to the following tables.

Table 2c

CONSUMER INSTALLMENT LOANS ORIGINATED BY NUMBER						
LOCATION	1999		2000*		TOTALS	
	#	%	#	%	#	%
Abington	11	52.4	4	44.5	15	50.0
Whitman	3	14.3	1	11.1	4	13.3
Rockland	3	14.3	1	11.1	4	13.3
INSIDE ASSESSMENT AREA	17	81.0	6	66.7	23	76.6
OUTSIDE ASSESSMENT AREA	4	19.0	3	33.3	7	23.4
TOTALS	21	100	9	100	30	100

Source: Bank Consumer Loan Data

*Year-to-Date May 26, 2000

Table 2d

CONSUMER INSTALLMENT LOANS ORIGINATED BY DOLLAR AMOUNT						
LOCATION	1999		2000*		TOTALS	
	\$000	%	\$000	%	\$000	%
Abington	120	56.6	39	43.8	159	52.9
Whitman	29	13.6	6	6.7	35	11.6
Rockland	19	9.0	3	3.4	22	7.3
INSIDE ASSESSMENT AREA	168	79.2	48	53.9	216	71.8
OUTSIDE ASSESSMENT AREA	44	20.8	41	46.1	85	28.2
TOTALS	212	100	89	100	301	100

Source: Bank consumer Loan Data

*Year-to-Date May 26, 2000

Despite the fact that NACB's consumer lending has occurred primarily within its assessment area, since the bank's loan portfolio is heavily concentrated in residential mortgages, more weight was given to the bank's residential loan activity. The bank's lending performance, relative to residential loans, indicates limited responsiveness to credit needs within the assessment area.

Based upon the foregoing information, the bank's level of lending within the assessment fails to meet the standards for satisfactory performance.

3. DISTRIBUTION OF CREDIT AMONG DIFFERENT INCOME LEVELS

The distribution of residential loans to borrowers of different incomes reflects adequate penetration within this area. Based upon this analysis, the bank's efforts meet the standards for satisfactory performance.

An analysis of NACB's Loan Application Register (LAR) data for calendar years 1999 and year-to-date May 26, 2000 was conducted in order to determine the distribution of loans based upon borrower income level. The analysis was based on the median family income within the Boston and Brockton Metropolitan Statistical Areas (MSA). The Boston MSA median family income for the years 1999 and 2000 was \$62,700 and \$65,500, respectively. The Brockton MSA median family income for 1999 and 2000

was \$55,700 and \$57,700, respectively. These figures are based upon estimated 1999 and 2000 Department of Housing and Urban Development (HUD) information.

Low-income is defined by the U.S. Census Bureau as income below 50 percent of the median family income level for the MSA. Moderate-income is defined as income between 50 to 79 percent of the median family income level for the MSA. Middle-income is defined as income between 80 and 119 percent of the median family income level for the MSA. Upper-income is defined as income at or greater than 120 percent of the median family income level for the MSA.

NACB originated 30 HMDA reportable loans in 1999 and 10 loans as of year-to-date 2000 within the assessment area. Loans extended to borrowers with incomes greater than 120 percent of the Boston and Brockton MSAs median family incomes represented the largest individual category with 60.0 percent of the total number and 70.0 percent of the total dollar amount for the period reviewed. Loans extended to borrowers of middle-income were next with 20.0 percent of the total number and 15.4 percent of the total dollar amount. Loans to borrowers of moderate-income and low-income represented 12.5 percent and 7.5 percent of loans originated, respectively. The following tables provide a breakdown of residential loans originated by applicant income level.

Table 3a

RESIDENTIAL LOANS ORIGINATED BY INCOME OF BORROWER (Number)						
% OF MEDIAN MSA INCOME	1999		2000*		TOTALS	
	#	%	#	%	#	%
<50%	3	10.0	0.0	0.0	3	7.5
50%-79%	3	10.0	2	20.0	5	12.5
80%-119%	4	13.3	4	40.0	8	20.0
120%>	20	66.7	4	40.0	24	60.0
TOTALS	30	100.0	10	100.0	40	100.0

Source: HMDA/LAR Data
*Year-to-Date May 26, 2000

Table 3b

RESIDENTIAL LOANS ORIGINATED BY INCOME OF BORROWER (Dollar)						
% OF MEDIAN MSA INCOME	1999		2000*		TOTALS	
	\$(000)	%	\$(000)	%	\$(000)	%
<50%	190	5.6	0	0.0	190	4.2
50%-79%	218	6.4	255	21.8	473	10.4
80%-119%	302	8.9	403	34.5	705	15.4
120%>	2,683	79.1	510	43.7	3,193	70.0
TOTALS	3,393	100.0	1,168	100.0	4,561	100.0

Source: HMDA/LAR Data
*Year-to-Date May 26, 2000

The following table shows the number and dollar volume of HMDA-reportable loans originated by the bank in comparison to all other lenders who made loans within the

assessment area during calendar year 1998. The 1998 information, which was produced by PCI Wiz, Inc., was utilized for comparison since this is the latest data available for aggregate analysis. It should be noted that the aggregate data has a relatively high number of "Not Available (NA)" entries. This may have the effect of skewing the data and its analysis.

1998 AGGREGATE HMDA DATA					
% OF MEDIAN FAMILY INCOME	% OF TOTAL HOUSEHOLDS	NUMBER OF LOANS		DOLLAR AMOUNT OF LOANS	
		BANK	AGGREGATE	BANK	AGGREGATE
		%	%	%	%
<50%	21.0	2.3	4.6	1.3	2.2
50%-79%	14.9	9.3	17.2	7.2	9.9
80%-119%	23.3	41.9	31.3	41.0	21.5
120%>	40.8	41.9	30.9	47.3	26.2
NA	0.0	4.6	16.0	3.2	40.2
TOTALS	100.0	100.0	100.0	100.0	100.0

According to this analysis, the number and dollar amount of HMDA-reportable loans originated by the bank among low and moderate-income borrowers was proportionately lower than that of other institutions within the assessment area. The percentage of NACB's HMDA-reportable loans granted to low-income borrowers, at 2.3 percent of the number and 1.3 percent of the dollar volume, was proportionately lower than that of all other lenders by both the number and dollar volume. However, the bank's performance in 1999 and year 2000 indicates an improvement overall in the dispersion of loans among low to moderate-income borrowers. In 1999 the bank made 10.0 percent of all loans equally to low and moderate-income borrowers while in 2000 it made 20.0 percent of all loans to moderate-income individuals. NACB's performance in the distribution of residential loans among low and moderate-income borrowers in 1999 and year to date May 26, 2000 has improved since 1998.

A review was also conducted of consumer installment loans originated in 1999 and year-to-date May 26, 2000. A review of a sample of 23 loans indicated that 17.4 percent of the total number of loans were granted to low-income borrowers and 34.8 percent were granted to moderate-income borrowers. The following tables provide additional information concerning income levels of the consumer loan sample.

Table 3c

CONSUMER INSTALLMENT LOANS ORIGINATED BY INCOME OF BORROWER (Number)						
% OF MEDIAN MSA INCOME	1999		2000*		TOTALS	
	#	%	#	%	#	%
<50%	3	17.6	1	16.7	4	17.4
50%-79%	7	41.2	1	16.7	8	34.8
80%-119%	2	11.8	4	66.6	6	26.1
120%>	5	29.4	0	0.0	5	21.7
TOTALS	17	100.0	6	100.0	23	100.0

Source: Bank Consumer Loan Data *Year-to-Date May 26, 2000

Table 3d

CONSUMER INSTALLMENT LOANS ORIGINATED BY INCOME OF BORROWER (Dollar)						
% OF MEDIAN MSA INCOME	1999		2000*		TOTALS	
	\$(000)	%	\$(000)	%	\$(000)	%
<50%	18	10.7	3	6.3	21	9.7
50%-79%	59	35.1	16	33.3	75	34.7
80%-119%	24	14.3	29	60.4	53	24.6
120%>	67	39.9	0	0.0	67	31.0
TOTALS	168	100.0	48	100.0	216	100.0

Source: Bank Consumer Loan Data

*Year-to-Date May 26, 2000

It should be noted that the large proportion of consumer loans to low and moderate-income borrowers is attributed to single-income applicants seeking consumer installment credit. Mortgage loans typically involve joint applicants whose combined incomes are higher than that for a consumer loan applicant applying alone.

Based upon the above information, NACB demonstrates a reasonable distribution of loans among borrowers of different income levels.

4. GEOGRAPHIC DISTRIBUTION OF LOANS

An analysis of the geographic distribution of residential loans and a comparative analysis of 1998 HMDA aggregate data indicates that the North Abington Co-operative Bank meets the standards for satisfactory performance.

The bank's assessment area contains ten census tracts, all of which are designated as middle-income. Since the bank has no low or moderate-income tracts in its assessment area an analysis based on the geographic distribution of residential loans is not meaningful. Nonetheless, the lending data as indicated in the loan application registers show a good dispersion throughout the assessment area.

5. REVIEW OF COMPLAINTS AND FAIR LENDING POLICIES AND PRACTICES

Based upon the review of the bank's public comment file and its performance relative to fair lending policies and practices, the institution meets the standards for satisfactory performance.

Review of Complaints

A thorough review of the public comment file revealed that the bank received no complaints pertaining to the institution's CRA performance since the previous examination.

Fair Lending Policies and Practices

North Abington Co-operative Bank has established an Equal Credit Opportunity Act Compliance Policy that deals with fair lending and discrimination in lending. Additionally, the bank has a Fair Lending Policy Statement included in its Loan Policy.

Detailed below is the bank's fair lending performance as it relates to the guidelines established by Regulatory Bulletin 2.3-101, the Division's Community Reinvestment and Fair Lending Policy.

STAFF TRAINING

In 1999 and year-to-date 2000 the bank's loan officers and senior management completed a computer-training module. The training programs are developed by the Association of Lending and Credit Risk Professionals and cover fair lending and fair housing issues.

STAFF COMPOSITION AND COMPENSATION

North Abington Co-operative Bank has a staff of 15 full-time and 9 part-time employees, none of whom are minorities.

The bank does not compensate either of its two loan officers on a commission basis, thereby encouraging loans of all amounts including those to low and moderate-income individuals.

OUTREACH

North Abington Co-operative Bank's Treasurer and CFO is a member of the Neighborhood Housing Services for the South Shore, formally the Quincy Neighborhood Housing Services. Through active involvement in this community organization, the bank can better ascertain the credit needs of the assessment area.

CREDIT PRODUCTS AND UNDERWRITING STANDARDS

The bank evaluates both the products it offers and its product mix on a continuing basis. This analysis is conducted to help determine whether the bank is offering competitive products and whether those products are responsive to the assessment area's needs.

North Abington Co-operative Bank offers its own First Time Home Buyers program with reduced rates. The bank originated one loan under this program totaling \$130,000 in February 2000.

The bank offers a Homeowners Septic Repair Loan program through the Massachusetts Housing Finance Agency. There have been six loans granted under this program totaling \$75,925 in 1999 and year-to-date 2000.

MARKETING

North Abington Co-operative Bank's advertising reaches individuals of all income levels and effectively covers the entire delineated assessment area. The bank advertises in newspapers throughout its assessment area, including The Brockton Enterprise, The Patriot Ledger and The Abington/Rockland Mariner.

CREDIT EDUCATION

The bank has not participated in any formal credit education programs since the previous examination.

COUNSELLING

North Abington Co-operative Bank refers all loan customers whose home loan is delinquent to the appropriate credit counseling services available in the area. In addition, the bank's management is willing to work with any customers that are experiencing credit difficulties.

SECOND REVIEW PRACTICES

As part of the second review process, loan officers are required to discuss all proposed loan denials with the President and CEO, and the Treasurer and CFO. This review is done to insure that applicants are treated equally and that a decision to decline is justified.

INTERNAL CONTROL PROCEDURES

The bank's Treasurer/CFO performs a review of the HMDA/LAR data on a quarterly basis.

MINORITY APPLICATION FLOW

A review of residential loan applications was conducted in order to determine the number of applications the bank received from minorities. For calendar year 1999 and Year-to-Date 2000, the bank received 50 residential loan applications from within its assessment area. During this period, one application or 2.0 percent, was received and approved from a member of a minority group.

The bank's minority application flow for 1998 was compared to the racial make-up of the assessment area and the 1998 aggregate data for all other HMDA reporters within the assessment area. Information for 1998 was used since this is the latest data available for comparison. The comparison of this data assists in deriving reasonable expectations for the institution's minority application flow.

According to 1990 Census Data, the bank's assessment area contained a total population of 43,180 individuals of whom 2.1 percent are minorities. Aggregate information indicates that, of the 4,153 HMDA-reportable applications received from other institutions within the assessment area in 1998, 2.7 percent were from minorities. By comparison, North Abington Co-operative Bank received a total of 49 applications in 1998; however, no application was received from any member of a minority group.

While still low in number, North Abington Co-operative Bank's minority application flow during the period examined appears to have improved marginally from earlier performance.

THE COMMONWEALTH OF MASSACHUSETTS

To the COMMISSIONER OF BANKS:

THIS IS TO CERTIFY, that the report of examination of the

NORTH ABINGTON CO-OPERATIVE BANK

for compliance with applicable consumer and fair lending rules and regulations and the Community Reinvestment Act (CRA), as of the close of business **MAY 26, 2000**, has been read to or by the undersigned and the matters referred to therein will have our immediate attention.

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A majority of the Board of Trustees/Trustees

Dated at _____ this _____ day of _____ 20 ____

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, and the Uniform Interagency Community Reinvestment Act (CRA) Guidelines for Disclosure of Written Evaluations require all financial institutions to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each local community;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks, at (Address at main office)."

[Please Note: If the institution has more than one local community, each office (other than off-premises electronic deposit facilities) in that community shall also include the address of the designated office for that community.]

- 4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee, which does not exceed the cost of reproduction, and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by its supervisory agency may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.